

The Honorable James L. Robart

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

## NORTHWEST ENVIRONMENTAL ADVOCATES,

Plaintiff,

V.

UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY,

Defendant.

CASE NO. 2:19-cv-01051-JLR

STIPULATED MOTION FOR AN  
EXTENSION OF TIME AND  
**[PROPOSED]** ORDER

## **Noted for: March 2, 2021**

Plaintiff Northwest Environmental Advocates (“NWEA”) and Defendant United States Environmental Protection Agency (“EPA”) (collectively “the parties”), by and through counsel, submit this stipulated motion to extend NWEA’s deadline to file its motion for costs and attorneys’ fees from March 12, 2021 to May 26, 2021. Good cause exists for this extension.

The parties settled NWEA’s claim for cost and attorneys’ fees, which was the only remaining issue in this Freedom of Information Act litigation. The settlement provides that the parties will seek dismissal of this case with prejudice after EPA makes payment. If EPA does not make payment during the time allotted, or if this Court does not grant this motion, NWEA may declare the agreement null and void and file a motion for fees and costs with the Court. This extension will provide sufficient time for EPA to make payment and the parties

1 to seek dismissal with prejudice, or if necessary, for NWEA to file a motion for fees and  
2 costs with the Court.

3 Accordingly, the parties request that the Court extend NWEA's deadline to file its  
4 motion for costs and attorneys' fees to May 26, 2021.

5 Respectfully submitted this 2nd day of March 2021.

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2  
3 **[PROPOSED] ORDER**

4 Good cause exists to extend Plaintiff's time to file a motion for costs and attorneys'  
5 fees. Plaintiff shall file its motion on or before May 26, 2021.

6 **IT IS SO ORDERED.**

7 Dated this 2nd day of March, 2021.

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10 JAMES L. ROBART  
11 United States District Judge